

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	:	

**CITY’S THIRD AMENDED LIST OF FACT WITNESSES RELATED TO  
THE PROPOSED PLAN FOR THE ADJUSTMENT OF DEBTS**

The City of Detroit, Michigan (the “City”), as the debtor in the above captioned case, files the City’s Third Amended List of Fact Witnesses Related to the Proposed Plan for the Adjustment of Debts, as required by the Fifth Amended Order Establishing Procedures, Deadlines, and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 5259) (the “Fifth Amended Scheduling Order”). The below fact witness list supersedes and replaces all previously identified fact witnesses by the City.

1. The City identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that it may call at the hearing on the proposed plan for the adjustment of the City’s debts (the “Plan”):

No.	NAME / TITLE
1.	Kevyn D. Orr, Emergency Manager for the City
2.	Kenneth A. Buckfire, CEO and Managing Director of Miller Buckfire & Co. LLC, financial advisors to the City
3.	Charles M. Moore, Senior Managing Director at Conway MacKenzie, Inc., operational restructuring advisors to the City
4.	Gaurav Malhotra, Principal of Ernst & Young LLP, financial restructuring advisors to the City
5.	Robert Cline, Director of State-Local Tax Policy Economics at Ernst & Young LLP, financial restructuring advisors to the City
6.	Caroline Sallee, Manager at Quantitative Economics and Statistics within Ernst & Young LLP, financial restructuring advisors to the City
7.	Glenn D. Bowen, Principal and Consulting Actuary at Milliman, Inc., Actuarial advisors to the City
8.	Suzanne Taranto, Principal and Consulting Actuary at Milliman, Inc., Actuarial advisors to the City
9.	Michael E. Duggan, Mayor of the City
10.	Brenda Jones, City Council President and At-Large City Council Member
11.	John Hill, Chief Financial Officer for the City
12.	Beth Niblock, Chief Information Officer for the City
13.	James E. Craig, Detroit Police Chief
14.	Edsel Jenkins, Detroit Executive Fire Commissioner
15.	Sue F. McCormick, Director, Detroit Water and Sewerage Department
16.	Vanessa Fusco, Associate Vice President and Museum Services Account Manager at Christie's
17.	Annemarie Erickson, Executive Vice President and Chief Operating

No.	NAME / TITLE
	Officer of the Detroit Institute of Arts
18.	Marc Schwartz, Member, Board of Directors of the Detroit Institute of Arts
19.	Roger S. Penske, Founder and Chairman of Penske Corporation
20.	Daniel Gilbert, Chairman and Founder of Rock Ventures, LLC and Quicken Loans, Inc.
21.	Rip Rapson, President and CEO of Kresge Foundation

2. The City reserves the right to further amend its list of fact witnesses as may be necessary to address: (i) any modifications or refinements to the Plan, or (ii) any objections to the Plan. The City will make any such additional witnesses available for deposition at a convenient time prior to the confirmation hearing.

3. The City reserves the right to identify any of the above fact witnesses as an expert witness on July 8, 2014, in accordance with the Fifth Amended Scheduling Order.

4. The City reserves the right to call as a witness during the confirmation hearing any fact witness identified by parties objecting to the Plan.

Dated: June 20, 2014

Respectfully submitted,

/s/ David G. Heiman

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

Bruce Bennett (CA 105430)

JONES DAY

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

Thomas F. Cullen, Jr. (DC 224733)

Gregory M. Shumaker (DC 416537)

Geoffrey S. Stewart (DC 287979)

JONES DAY

51 Louisiana Ave., N.W.

Washington, D.C. 20001

Telephone: (202) 879-3939

Facsimile: (202) 626-1700

tfcullen@jonesday.com

gshumaker@jonesday.com

gstewart@jonesday.com

Robert S. Hertzberg (P30261)  
Deborah Kovsky-Apap (P68258)  
PEPPER HAMILTON LLP  
4000 Town Center, Suite 1800  
Southfield, MI 48075  
Telephone: (248) 359-7300  
Facsimile: (248) 359-7700  
hertzbergr@pepperlaw.com  
kovskyd@pepperlaw.com

ATTORNEYS FOR THE CITY OF DETROIT

### **CERTIFICATE OF SERVICE**

I, David G. Heiman, hereby certify that the foregoing City's Third Amended List of Fact Witnesses Related to the Proposed Plan for the Adjustment of Debts was filed and served via the Court's electronic case filing and noticing system on this 20th day of June, 2014.

/s/ David G. Heiman